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L.R.A. DOCKET ROOM

September 7, 2004

VIA HAND DELIVERY

Sharla Dillon, Docket Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re Coalition of Small Lec's
Docket Nos. 03-00585

Dear Ms. Dillon:

Enclosed are a total of fourteen copies of Testimony of Lera Roark on behalf of the Coalition of Small LECs and Cooperatives, to be filed of record in the above-referenced matter, plus a copy to be stamp-filed and returned to us.

Thank you for your assistance in this matter.

Sincerely,



William T. Ramsey

/jm
enclosures

LATE FILED

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

Generic Docket Addressing Rural Universal Service)	Docket No. 00-00523
)	
)	
Petition of Cellco Partnership d/b/a Verizon Wireless for Arbitration under the Telecommunications Act)	Docket No. 03-00585
)	
)	
Petition of BellSouth Mobility LLC; BellSouth Personal Communications, LLC; Chattanooga MSA Limited Partnership, Collectively d/b/a Cingular Wireless, for Arbitration under the Telecommunications Act)	Docket No. 03-00586
)	
)	
Petition of AT&T Wireless PCS, LLC d/b/a AT&T Wireless for Arbitration under the Telecommunications Act)	Docket No. 03-00587
)	
)	
Petition of T-Mobile USA, Inc. for Arbitration under the Telecommunications Act)	Docket No. 03-00588
)	
)	
Petition of Sprint Spectrum L.P. d/b/a Sprint PCS for Arbitration under the Telecommunications Act)	Docket No. 03-00589
)	

TESTIMONY OF LERA ROARK

on behalf of the

Coalition of Small LECs and Cooperatives

September 7, 2004

Q: Please state your name, business address and telephone number.

A: My name is Lera Roark. My business address is 1309 Louisville Avenue, Monroe, Louisiana 71201. My business phone number is 318-322-0015.

Q: What is your current position?

A: I am the Vice President of the Crockett Telephone Company, Peoples Telephone Company and West Tennessee Telephone Company. I also serve as Vice President of TEC Services, Inc., and in a similar capacity with other TEC affiliated local exchange carriers. Among my duties, I am responsible for the overall interconnection relationships of the TEC affiliated local exchange carriers with other carriers including the billing of carriers for interconnection services.

Q: On whose behalf are you filing this testimony?

A: I am submitting this testimony on behalf of the Coalition of Small LECs and Cooperatives (hereafter referred to as the "Coalition" or the "ICOs").

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to supplement the testimony in this case regarding the ICO's ability to identify the traffic sent to them by the CMRS providers, and to specifically respond to the following testimony given by Ms. Suzanne Nieman from AT&T Wireless at page 34 of her testimony:

6 CHAIRMAN MILLER: Mr. Ramsey, before
7 you go ahead, I want to clarify one point. Is it your
8 testimony that the ICOs, when they receive traffic from
9 the tandem, can identify that?

10 THE WITNESS: If the information -- it
11 goes through the --

12 CHAIRMAN MILLER: On their own,
13 without BellSouth.

14 THE WITNESS: If they had a billing
15 system that read that information, yes. But going
16 through BellSouth --

17 CHAIRMAN MILLER: There's sufficient
18 information passed that they can identify?

19 THE WITNESS: Yes.

Q: Do you agree with Ms. Nieman's testimony?

A: No, I do not. The statement at the hearing that ICOs could record the traffic in real time and bill it if they simply upgrade their "billing system[s]" is incorrect. Apparently the CMRS Providers do not understand the billing and switches involved in this three-way arrangement among the ICOs, the CMRS Providers and BellSouth. The type of call

record that can be recorded by the switch determines whether traffic can be identified and ultimate billing capabilities, not simply the "billing system."

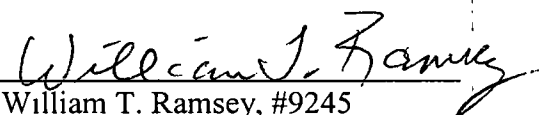
First of all, if an ICO has a tandem and direct trunk groups with another carrier, then that ICO can identify and measure, on a realtime basis, the traffic from the specific carrier. In such case, the only traffic that comes over the dedicated trunk group is that traffic that belongs (or should only belong to) that carrier or those carriers they have agreed to be responsible to terminate via their dedicated trunk group.

Even where an ICO has a tandem, BellSouth uses a common trunk group (through which the CMRS providers traffic is commingled with BellSouth's and other carrier's traffic) known as a Feature Group C ("FGC") trunk group. Traffic over this joined, commingled trunk group cannot be identified as to the specific originating carrier on a realtime basis because such identifying information is not passed through the FGC trunk group. Even if BellSouth upgraded the trunk group to Feature Group D (a superior form of trunking arrangement), BellSouth would have to upgrade its switch software to enable it to send a record type that contains the carrier ID in the terminating record. ICOs sometimes record terminating traffic using 720 call-type records, via the automatic message accounting (AMA) software contained in the switch. This recording function does not have anything to do with billing, it is a switch function. Regardless, basic information (identifying the caller and the carrier) must be received in order to process the data in the billing system. The absence of this identifying data prevents the billing system from being able to identify and bill. Accordingly, it is not simply the billing system that prevents direct identification and measurement, on a realtime basis, for the ICOs. These 720 call-type records do not contain the carrier ID, thus the ICO does not know who to bill, and can only capture the grand total of terminating traffic (that is intermingled from all carriers using that trunk group).

The ICOs must rely on BellSouth to provide them with after-the-fact terminating records to identify the carrier for all calls terminating via a common trunk group, even if the ICO has a tandem. BellSouth populates the OCN (Operating Company Number) field to identify specific CMRS carriers and does not populate the CIC (carrier identification field) in the terminating records provided to the ICO for billing to the CMRS carrier.

Respectfully submitted,

NEAL & HARWELL, PLC

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on Sept 7, 2004, a true and correct copy of the foregoing was served on the parties of record via first-class mail and electronic mail:

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